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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**06CRIM 1160**

UNITED STATES OF AMERICA

INDICTMENT

v.

06 Cr.

JUAN OTANEZ,  
a/k/a "Wilfredo Lopez,"**M-15-0062-M**

Defendant.

COUNT ONE

The Grand Jury charges:

1. On or about March 4, 2005, in the Southern District of New York, JUAN OTANEZ, a/k/a "Wilfredo Lopez," the defendant, unlawfully, wilfully, and knowingly did make false statements in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, to wit, JUAN OTANEZ, a/k/a "Wilfredo Lopez," the defendant, submitted an application for a United States passport containing false information, including a false name, place of birth, date of birth, and social security number.

(Title 18, United States Code, Section 1542).

FOR PERSON

  
MICHAEL J. GARCIA  
MICHAEL J. GARCIA  
United States Attorney